



## REGION 1

BOSTON, MA 02109

*Dated By Electronic Signature*

Susan Duquette, President  
Lakeview Marine, Inc.  
311 Thompson Road  
Webster, MA 01570

Subject: 12/05/2024 EPA Inspection of Lakeview Marine, Inc. (MANOEJOCT)

Dear Ms. Duquette:

On December 5, 2024, the U.S. Environmental Protection Agency ("EPA") performed an inspection at Lakeview Marine, Inc. (the "Facility") regarding compliance with the National Pollutant Discharge Elimination System ("NPDES") program of the Clean Water Act. Copies of the inspection report and photolog are enclosed with this letter.

As a reminder, the Facility has submitted a No-Exposure Certification ("NEC") for exclusion from EPA's Multi-Sector General Permit ("MSGP") for stormwater discharges associated with industrial activity<sup>1</sup>. A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff.

Rinse wash water, at standard hose pressure, that comes into contact with detergents, regardless of the type of detergents involved (biodegradable, etc.), cannot be discharged under either an NEC or the MSGP. Additionally, the discharge of wash water generated by pressure washing is prohibited, independent of whether detergents are used.

Specific comments, informed by the inspection, are as follows:

1. In the area of the Facility where outboard motors are flushed and washed, EPA observed a small section of the process water catchment system's basin that was not under cover. EPA requested that you shift either the basin or the temporary cover so that no part of the basin is exposed to precipitation. Within 30 days receipt of this letter, provide a photograph showing that this adjustment was made and that all parts of the catchment system's basin are under cover.
2. In the area of the Facility where outboard motors are flushed and washed, the process water catchment system was under a temporary cover. A Facility representative, Mr. Randy Johnson,

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<sup>1</sup> See more information about the MSGP No-Exposure Certification on EPA's website:

<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-conditional-no-exposure-exclusion>

indicated that the temporary cover would be replaced with a permanent cover in the spring of 2025. By June 1<sup>st</sup>, 2025, **provide** a photograph showing the permanent cover, once installed.

3. Mr. Johnson indicated that a permanent containment area would be constructed over the boat washing area in the spring of 2025. By June 1<sup>st</sup>, 2025, **provide** a photograph of the updated pressure washing bay, including proper containment.

Please provide a response to these comments by the deadlines stated in the questions above in an electronic format to the following technical contact:

Eleanor Horvath  
horvath.eleanor@epa.gov

If you have any technical questions relating to this letter, please contact Eleanor Horvath of my staff at 617-918-1061 or horvath.eleanor@epa.gov. Legal issues may be directed to Jeff Kopf, Senior Enforcement Counsel, at 617-918-1796.

Sincerely,

**NEWTON**  
**TEDDER**

Digitally signed by  
NEWTON TEDDER  
Date: 2025.01.24  
10:26:22 -05'00'

Newton Tedder, Manager  
Water Compliance Section 1  
Enforcement and Compliance Assurance Division

Enclosures:

Inspection Report  
Photolog

CCs (electronic only):

Randy Johnson, Lakeview Marine, Inc.  
Jeff Kopf, U.S. Environmental Protection Agency  
Alex Rosenberg, U.S. Environmental Protection Agency  
Eleanor Horvath, U.S. Environmental Protection Agency



## REGION 1

BOSTON, MA 02109

**Date:** *Dated as shown on electronic signature(s)*

**Subj:** Inspection Report – Clean Water Act (“CWA”)  
National Pollutant Discharge Elimination System (“NPDES”)

**From:** Eleanor Horvath, U.S. Environmental Protection Agency Inspector

**Thru:** Alex Rosenberg, U.S. Environmental Protection Agency Inspector

**To:** File

### I. Facility Information

- A. *Facility Name:* Lakeview Marine, Inc.
- B. *Facility Location:* 311 Thompson Road  
Webster, MA 01570
- C. *Facility Contacts:* Randy Johnson  
Facility Manager
- D. *ID No(s):* MANOEJOCT

**ELEANOR  
HORVATH** Digitally signed by  
ELEANOR HORVATH  
Date: 2025.01.23  
19:25:09 -05'00'

### II. Background Information

- A. *Date(s) of inspection:* 12/05/2024
- B. *Weather Conditions:* 37 degrees Fahrenheit, partly cloudy. Snow on ground.
- C. *US EPA Representative(s):* Newton Tedder  
Eleanor Horvath
- D. *State/Local Representative(s):* N/A
- E. *Federally Enforceable Requirements Covered During the Inspection:*

National Pollutant Discharge Elimination System  
Multi-Sector General Permit ("MSGP"), Effective June 1st, 2021

*F. Previous Enforcement Actions:* Expedited Settlement Agreement,  
Signed by Facility August 30<sup>th</sup>, 2024

**III. Type and Purpose of Inspection**

Post-Enforcement Evaluation

**IV. Facility Description**

Lakeview Marine, Inc. owns and operates a marina at 311 Thompson Road, Webster, Massachusetts (the "Facility"). The Facility comprises of approximately two acres, including retail space, garages for boat washing and maintenance, a boat yard, and a harbor on Chaubunagungamaug (or "Webster") Lake.

**V. Inspection**

***A. Opening Conference***

Inspectors Newton Tedder and Eleanor Horvath arrived onsite at 10:00 AM. They entered the Facility's retail space and presented their credentials to Mr. Randy Johnson. The Inspectors introduced themselves and explained the purpose of the inspection.

***B. Facility Tour***

Upon request, Mr. Johnson brought EPA to the area of the site that had been identified by EPA as having the potential to discharge process water into the nearby lake.

EPA observed the area where the Facility flushed and washed boats' outboard motors. While being worked on, the motors are moved under a temporary cover, where they are protected from exposure to precipitation. Mr. Johnson explained that the Facility planned to construct a permanent cover in the same location. EPA also observed a process water catchment system below the cover, over which the outboard motors were flushed. Inspector Tedder observed that one edge (approximately 6-12 inches) of the catchment basin was not under the temporary cover, and informed Mr. Johnson that the basin should be shifted entirely under the cover so it would not fill with precipitation and overflow.

Mr. Johnson also showed EPA the area where the Facility had been power washing boats, but informed EPA that the Facility has ceased power washing until a second process water catchment system is constructed. EPA observed a permanent canopy over this area and a gravel surface beneath it. EPA and Mr. Johnson discussed the requirements for this second catchment system, including the possibility for the process water to infiltrate through the gravel surface into the ground. Inspector Tedder informed Mr. Johnson that all process water would need to infiltrate, which may require additional retention volume (e.g., an excavated catch basin with no outlet).

EPA also asked Mr. Johnson about industrial activities onsite other than boat washing. Mr. Johnson explained that any boat painting would take place inside the shop (not in the yard), and that no work was allowed on boats at the Facility by owners. EPA did not observe any open drums in the yard, nor anything else that would suggest industrial activities not under cover.

### ***C. Closing Conference***

EPA informed Mr. Johnson that he would be receiving an inspection report and that they may inspect the Facility again in the future to see the permanent cover and second process water catchment system. EPA departed at approximately 10:15 AM.

### ***D. Inspection Photos***

| Photo File Name              | Field Description                        |
|------------------------------|------------------------------------------|
| lakeview_20241205_095940.jpg |                                          |
| lakeview_20241205_095957.jpg | Just the motors go under                 |
| lakeview_20241205_100035.jpg |                                          |
| lakeview_20241205_100054.jpg |                                          |
| lakeview_20241205_100133.jpg | This will be the pressure wash bay       |
| lakeview_20241205_100137.jpg |                                          |
| lakeview_20241205_100144.jpg |                                          |
| lakeview_20241205_100231.jpg |                                          |
| lakeview_20241205_100252.jpg | Pressure washing will happen under there |
| lakeview_20241205_100900.jpg | Going to build an actual structure       |

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.